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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	CASE NO. 2:20-CR-00298-GMN-EJY
Plaintiff,)	
)	CASE NO. 2:20-CR-00299-GMN-EJY
vs.)	
)	
ANTHONY SULLIVAN,)	
)	
Defendant.)	

**STIPULATION TO CONTINUE SENTENCING HEARING
 (First Request)**

IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by and through its attorney, CHRISTOPHER CHIOU, Acting United States Attorney, through KIMBERLY ANNE SOKOLICH, Assistant United States Attorney; and Defendant ANTHONY SULLIVAN, by and through his counsel, RUSSELL E. MARSH, ESQUIRE and SUNETHRA MURALIDHARA, ESQUIRE, Wright Marsh & Levy, that the sentencing hearing currently scheduled for September 29, 2021, at 10:00 a.m. be vacated and set to a date and time convenient to this Court, but no sooner than one hundred twenty (120) days from the current sentencing date.

This stipulation is entered into for the following reasons:

1. The parties need additional time to prepare for Defendant Anthony Sullivan's sentencing hearing. On June 30, 2021 a Change of Plea was held in case 2:20-cr-00298-GMN-EJY (ECF 68) and 2:20-cr-00299-GMN-EJY (ECF 39).

1 2. The parties agree to the continuance. Mr. Sullivan is currently on pretrial release and
2 agrees to the continuance.

3 3. Additionally, denial of this request for continuance could result in a miscarriage of
4 justice.

5 4. The additional time requested by this Stipulation is made in good faith and not for
6 purposes of delay.

7 5. This is the first request for a continuance of the sentencing hearing.

8 Dated this 17th day of September, 2021.

9 Respectfully submitted:

10 WRIGHT MARSH & LEVY

CHRISTOPHER CHIOU
ACTING UNITED STATES ATTORNEY

11
12 BY /s/ Russell E. Marsh
13 RUSSELL E. MARSH, ESQUIRE
14 SUNETHRA MURALIDHARA
Attorneys for Anthony Sullivan

BY /s/Kimberly Anne Sokolich
KIMBERLY ANNE SOKOLICH
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
ANTHONY SULLIVAN,
Defendant.

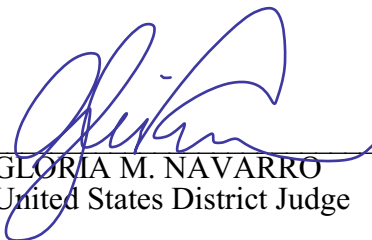
CASE NO. 2:20-CR-00298-GMN-EJY

CASE NO. 2:20-CR-00299-GMN-EJY

Pursuant to the Stipulation of the Parties and for good cause appearing the sentencing hearing in this matter is hereby continued. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IS IT HEREBY ORDERED that the sentencing in the above-captioned matter currently scheduled for September 29, 2021, at 10:00 a.m., be vacated and continued to Wednesday, February 2, 2022, at 10:00 a.m. in Courtroom 7D before Judge Gloria M. Navarro.

DATED: Sept. 20, 2021


GLORIA M. NAVARRO
United States District Judge